USDA Beef Export Verification (BEV) Program

1 Purpose

The purpose of this document is to set forth the policies, procedures, and requirements of the USDA Beef Export Verification (BEV) Program and for the independent process verification of participants in the BEV Program. The BEV Program is a voluntary, user-fee service available to suppliers of beef and beef products. Beef and beef products produced by suppliers approved under this Program are derived from cattle slaughtered in the United States (U.S.). Such product is eligible to be identified and labeled as meeting the requirements of this Program.

2 Scope

This Procedure applies to suppliers of beef and beef products that label and sell product as meeting the requirements of the BEV Program. The USDA Agricultural Marketing Service (AMS) will conduct independent process verification audits of suppliers' program documentation and procedures with regard to the BEV Program requirements.

3 Reference Documents

ARC Instruction 1000 Quality Systems Verification Program General Policies and Procedures.

4 Definitions

- 4.1 <u>Conforming Product</u>: Any product (beef or beef products) that meets, and can be verified as meeting, the requirements of the BEV Program. Such product may be identified and labeled as meeting the requirements of the BEV Program.
- 4.2 <u>Eligible Supplier</u>: Any slaughter facility or processing facility that manufactures beef and/or beef products meeting all requirements of the BEV Program. Suppliers are deemed eligible upon implementation of a program that addresses the requirements of the BEV Program and upon successful completion of an audit.
- 4.3 <u>Non-conforming Product</u>: Any product (beef or beef products) that does not meet, or can not be verified as meeting, the requirements of the BEV Program. Such product must be excluded from product labeled as meeting the requirements of the BEV Program.
- 4.4 <u>Program Documentation</u>: Documents and records prepared and maintained by the eligible supplier that describe and record the company's procedures for ensuring products received, processed, and identified conform to the BEV Program requirements and this Procedure. This documentation may be in the form of a well-defined quality manual or an accumulation of controlled program documents and records that meets all BEV Program requirements.

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Date Approved: August 8, 2003 Approved by______ MJD

- Segregation Plan: Documents prepared and maintained by an eligible supplier that describe the 4.5 facility's procedures for (1) ensuring that beef and beef products destined for use in the BEV Program are derived from cattle slaughtered in the U.S., (2) ensuring that beef and beef products destined for use in the BEV Program are appropriately identified and labeled, (3) describing how conforming product will be identified and handled, and (4) describing how non-conforming product will be identified and handled.
- 4.6 Surveillance Audit: A review of an eligible supplier's facilities, procedures, and records (1) to determine conformance with the approved segregation plan and this Procedure, and (2) to verify the eligible supplier's ability to meet all of the requirements of the BEV Program. These audits will be conducted by the USDA, AMS, Livestock and Seed Program, Audit, Review, and Compliance (ARC) Branch.

Program Requirements

- All beef and beef products identified as meeting the requirements of the BEV Program must be derived from cattle slaughtered in the U.S.
- 5.2 Only eligible suppliers may produce beef and beef products for the BEV Program. Eligible suppliers must be listed on the Official Listing of Eligible Suppliers for the Beef Export Verification (BEV) Program.
- 5.3 Only beef and beef products that meet the requirements of the BEV Program may be identified and labeled as such. Documentation for finished product must identify each lot of conforming product by including the lot number, production date, production code, number of boxes, manufacturer, and the statement "Product Meets BEV Program Requirements".
- 5.4 Only beef and beef products produced by eligible suppliers and identified as meeting the requirements of the BEV Program may have the FSIS Export certificate amended to read, "The shipment contains only meat and meat products that were derived from cattle slaughtered in the **U.S.**"
- 5.5 Program documentation must contain, at a minimum:
 - The names and positions of persons with managerial responsibilities for operation of the 5.5.1 BEV Program;
 - 5.5.2 Written procedures that describe the company's procedures for ensuring products received, processed, and identified conform to the BEV Program requirements;
 - 5.5.3 A written segregation plan that describes the identification, segregation, and labeling of product;
 - 5.5.4 Completed examples of all forms, tags, labels, etc. used to track or demonstrate Program conformance; and
 - 5.5.5 An issue date or other method for identifying the most current version of all program documentation
- Conformance with the BEV Program requirements will be determined through 5.6 fee-for-service, process verified, surveillance audits conducted by the ARC Branch using this Procedure and ARC Instruction 1000 Quality Systems Verification Program General Policies and Procedures.

6 Supplier Responsibilities

- 6.1 Request initial assessment of eligibility by submitting the following to the ARC Branch Washington, D.C., office.
 - 6.1.1 A completed and signed LS Form 313, Application for Service;
 - 6.1.2 A cover letter requesting an BEV Program audit; and
 - 6.1.3 Program documentation used to ensure conformance to the BEV Program requirements and this Procedure, including a copy of the written segregation plan.
- 6.2 Ensure that beef and beef products destined for use in the BEV Program conform to the requirements of the Program.
- 6.3 Properly identify all conforming and non-conforming product to ensure traceability.
- 6.4 Maintain traceability of conforming and non-conforming product to determine conformance to the BEV Program requirements.
- 6.5 Maintain segregation of conforming and non-conforming product.
- 6.6 Provide and maintain documentation for finished product that identifies each lot of conforming product by including the lot number, production date, production code, number of boxes, manufacturer, and the statement "Product Meets BEV Program Requirements".
- 6.7 Ensure that all persons with responsibilities for Program activities have been properly trained and have a complete understanding of all Program requirements relevant to their area of responsibility.
- 6.8 Monitor information relating to customer perception as to whether the supplier has met BEV Program requirements.
- 6.9 Address all non-conformances within the timeframe outlined in the audit report.
- 6.10 Comply with all provisions of this Procedure, and applicable Rules and Regulations.
- 6.11 Maintain complete records demonstrating conformance with the BEV Program.
- 6.12 Provide any and all documents and records (written or electronic) necessary to verify conformance.
- 6.13 Provide access to all areas of an establishment or facility that is requesting an eligibility status.
- 6.14 Immediately notify the ARC Branch Washington, D.C., of any changes in the approved program documentation used to verify conformance of beef and beef products destined for use in the BEV Program.
- 6.15 Notify the ARC Branch Washington, D.C., to cancel service prior to the next surveillance audit when service is no longer desired.

7 ARC Branch Responsibilities

- 7.1 Review submitted *LS Form 313, Application for Service*, program documentation and segregation plans.
- 7.2 Assign a qualified USDA ARC Branch auditor to perform an initial audit as soon as possible upon determining that the *LS Form 313 Application for Service* is complete and that the submitted program documentation and segregation plan meet the requirements of the BEV Program.
- 7.3 Conduct audits according to this Procedure and ARC Instruction 1000 Quality Systems Verification Program General Policies and Procedures.
- 7.4 Prepare a detailed report of the audit observations, findings, and a recommendation.
- 7.5 Forward the audit report and the final decision to the supplier or source.
- 7.6 Ensure surveillance audits are performed as required by this Procedure.
- 7.7 Maintain and publish the *Official Listing of Eligible Suppliers for the Beef Export Verification* (BEV) Program.

8 Surveillance Audits

- 8.1 ARC Instruction 1000 Quality Systems Verification Program General Policies and Procedures and the requirements outlined in this Procedure will be used to assess suppliers.
- 8.2 All eligible suppliers will be audited at least three (3) times per year. However, more frequent audits may be conducted if either numerous continuous improvement points or a hold point are identified during the audit.
- 8.3 All eligible suppliers are subject to unannounced audits by the ARC Branch.

9 Approval Procedures

- 9.1 ARC Instruction 1000 Quality Systems Verification Program General Policies and Procedures and the requirements outlined in this Procedure will be used to approve or deny suppliers.
- 9.2 <u>Approval</u>. A supplier who has been found to conform to this Procedure and the approved program documentation and segregation plan will be considered eligible. Once eligible, the ARC Branch will post the supplier's information on the *Official Listing of Eligible Suppliers for the Beef Export Verification (BEV) Program*.
- 9.3 <u>Denied Approval</u>. The ARC Branch may deny eligibility for any of the following reasons:
 - 9.3.1 Failure to adequately address any requirements.
 - 9.3.2 Failure to demonstrate capability to meet any requirement.
 - 9.3.3 Finding of a hold point to stated procedures.
 - 9.3.4 Denying access to an eligible supplier's facilities, documentation, or records within the scope of the requested audit.
 - 9.3.5 Presenting false or misleading information to USDA personnel.

- 9.4 <u>Suspending Approval</u>. The ARC Branch may suspend eligibility and remove an eligible supplier from the applicable Official Listing for any of the following reasons:
 - 9.4.1 Failure to follow requirements set forth in this Procedure, the approved program documentation, or written segregation plan.
 - 9.4.2 Implementing significant changes to approved program documentation, or written segregation plan or without prior written notification to the ARC Branch.
 - 9.4.3 Deliberate misrepresentation of the eligibility of beef or beef products.
 - 9.4.4 Presenting false or misleading information to USDA personnel.
 - 9.4.5 Confirmed finding of non-conforming beef or beef products that were utilized in the BEV Program. Upon confirming the violation, the ARC Branch will suspend the supplier's eligibility pending a complete investigation, in cooperation with appropriate regulatory agencies.
 - 9.4.6 Denying access to an eligible supplier's facilities, documents, or records within the scope of the requested audit.
 - 9.4.7 Failure to respond to non-conformances in the timeframe provided.
 - 9.4.8 Failure to pay ARC Branch fees.

The ARC Branch will notify the supplier in writing of the suspension and the details on actions required to regain eligibility status.

9.5 <u>Cancellation</u>. Eligible suppliers may cancel service at any time by notifying the ARC Branch in writing. Eligible suppliers who cancel service will be removed from the *Official Listing of Eligible Suppliers for the Beef Export Verification (BEV) Program*. Suppliers who cancel service must reapply and be reassessed through an audit before they will be returned to the appropriate Official Listing.

10 ARC Branch Contact Information

USDA, AMS, LS, ARC Branch Stop 0294, Room 2627-S 1400 Independence Avenue, SW Washington, DC 20250

Phone: (202) 720-1124 Fax: (202) 690-3428